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*Attorneys for Petitioners Graham Robinson and Ivy Chua,
in their capacities as Joint Official Liquidators of
Ascentra Holdings, Inc. (in Official Liquidation)*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Ascentra Holdings, Inc. (In Official Liquidation),

Debtor in a Foreign Proceeding.¹

Case No. 21-11854 (DSJ)

Chapter 15

DECLARATION OF JOHN A. PINTARELLI

I, John A. Pintarelli, under penalty of perjury, declare as follows:

1. I am a partner at the law firm of Pillsbury Winthrop Shaw Pittman LLP, counsel to Graham Robinson and Ivy Chua, the duly appointed joint official liquidators (“**Petitioners**”) of Ascentra Holdings, Inc. (In Official Liquidation) (“**Ascentra**” or the “**Debtor**”), a company in official liquidation in the Cayman Islands (the “**Cayman Proceeding**”). I am duly admitted to practice before the United States District Court for the Southern District of New York.

¹ The Debtor’s company registration number is 283719. The Debtor’s registered office is c/o JTC (Cayman) Ltd., 94 Solaris Avenue, Second Floor, Camana Bay, PO Box 30745, Grand Cayman, Cayman Islands, KY1-1203.

2. I respectfully submit this declaration in support of the Petitioners' chapter 15 petition, filed contemporaneously herewith, which seeks entry of an order recognizing the Cayman Proceeding as a foreign main proceeding, recognizing the Liquidators as "foreign representatives," and granting related relief.

3. As of the date hereof, my firm has received a retainer deposit from the Petitioners on behalf of the foreign debtor, which retainer is being held in a client trust account in New York maintained by J.P. Morgan Chase Bank.

4. Attached as **Exhibit A** is a true and correct copy of the order recognizing as a main proceeding a Cayman Islands company liquidation in the case of *In re Platinum Partners Value Arbitrage Fund L.P. (In Provisional Liquidation), et al.*, No. 16-12925 (SCC) (Bankr. S.D.N.Y. Nov. 23, 2016).

5. Attached as **Exhibit B** is a true and correct copy of the order recognizing as a main proceeding a Cayman Islands liquidation of an investment fund as a foreign main proceeding in the case of *In re Global Trade Finance Fund Ltd. (In Official Liquidation), et al.*, No. 20-10132 (MEW) (Bankr. S.D.N.Y. Feb. 19, 2020).

6. Attached as **Exhibit C** is a true and accurate copy of the order recognizing a Cayman Islands company liquidation in the case of *In re Bancredit Cayman Ltd. (in Official Liquidation)*, No. 06-11026 (SMB) (Bankr. S.D.N.Y. Jun. 16, 2006).

7. Attached as **Exhibit D** is the order recognizing as a main proceeding a Cayman Islands company liquidation in the case of *In re LDK Solar Co., Ltd.*, No. 14-12387 (PJW) (Bankr. D. Del. Nov. 21, 2014).

8. Attached as **Exhibit E** is the order recognizing as a main proceeding a Cayman Islands company liquidation in the case of *In re AJW Offshore Ltd.*, No. 13-70078 (AST) (Bankr. E.D.N.Y. Feb. 5, 2013).

9. Attached as **Exhibit F** is a true and accurate copy of a bench decision granting recognition of a foreign main proceeding and explaining the nature of collective proceedings for purposes of chapter 15 of title 11 of the United States Code, 11 U.S.C. § 101 et seq. (*i.e.*, that they consider the rights and obligations of all creditors) in the case of *In re Ashapura Minechem Ltd.*, No. 11-14668 (JMP) (Bankr. S.D.N.Y. Nov. 22, 2011).

10. Attached as **Exhibit G** is the order recognizing as a main proceeding a Cayman Islands company liquidation in the case of *In re Saad Invs. Fin. Co. (No. 5) Ltd.*, No. 09-13985 (KG) (Bankr. D. Del. Dec. 17, 2009).

11. Attached as **Exhibit H** is a true and correct copy of the order recognizing as a foreign main proceeding the British Virgin Islands liquidation of a similar offshore structure in the case of *In re Lawndale Group S.A.*, No. 15-11352 (SCC) (Bankr. S.D.N.Y. Jul. 6, 2015).

12. Attached as **Exhibit I** is a true and correct copy of the order recognizing as a foreign main proceeding the British Virgin Islands liquidation of a similar offshore structure in the case of *In re Pioneer Freight Futures*, No. 13-12324 (JMP) (Bankr. S.D.N.Y. Aug. 23, 2013).

13. Attached as **Exhibit J** is a true and correct copy of the order granting recognition of the British Virgin Islands liquidation of a similar offshore structure as a foreign main proceeding in the case of *In re Farenco Shipping Co. Ltd.*, No. 11-14138 (REG) (Bankr. S.D.N.Y. Feb. 24, 2012).

Pursuant to Section 1746 of Title 28 of the United States Code, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: October 27, 2021
New York, New York

/s/ John A. Pintarelli
John A. Pintarelli